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September 18, 2003

VIA FIRST CLASS MAIL AND E-MAIL

Luly E. Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3550 – DPUC Implementation of the Federal Communications
 Commission's Triennial Review Order

Dear Ms. Massaro:

On behalf of WorldCom, Inc. ("MCI"), enclosed please find an original and nine copies of a Motion to Intervene in the above-referenced docket.

Please date stamp the enclosed photocopy of this letter and return it to me in the enclosed, self-addressed stamped envelope.

If you have any questions or concerns, please do not hesitate to call.

Sincerely yours,

Alan D. Mandl
Bar No. 6590

ADM:jr
Enclosure

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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In re: Implementation of the Requirements of)	
the Federal Communications Commission's)	
Triennial Review Order)	
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Docket No. 3350

MOTION TO INTERVENE OF MCI

Pursuant to the September 18, 2003, Notice of Implementation issued by the Commission, WorldCom, Inc. ("MCI") hereby moves to intervene in the above-captioned matter. In support of its Motion, MCI states as follows:

1. MCI, through its operating subsidiaries, is authorized by the Commission to provide intrastate telecommunications services in Rhode Island, both as a toll and local service provider.
2. MCI provides intrastate telecommunications services within Rhode Island pursuant to such authorization.
3. MCI has a vital interest in the outcome of the Commission's inquiry because it relies upon access to unbundled network elements from Verizon-Rhode Island in order to provision local exchange services to residential and small business customers in Rhode Island. MCI has a direct and substantial interest in demonstrating to the Commission that MCI and other carriers will be impaired without access to unbundled switching for mass market customers, given the substantial economic and operational impediments facing competitors in offering local service through their own or non-Verizon switches.

4. MCI also has an interest in purchasing high capacity loops and dedicated transport from Verizon, and thus, has a direct and substantial interest in demonstrating to the Commission that MCI and other carriers will be impaired without access to these unbundled elements.

5. No other party can adequately represent the unique and specific interests of MCI in this matter.

6. If permitted to intervene, MCI intends to conduct discovery, present witnesses and file written briefs in accordance with the procedures adopted by the Commission for the conduct of its inquiry.

7. Copies of all pleadings and other papers should be sent to:

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For the reasons above, MCI requests that the Commission allow its Motion to Intervene.

Respectfully submitted,

WORLDCOM, INC.

By its attorney,

Alan D. Mandl, Bar No. 6590
Mandl & Mandl LLP
10 Post Office Square-Suite 630
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(617) 556-1998

Dated: September 18, 2003

